



Navigating our future.

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September 13, 2016

Via email to: [Purvi.Patel@state.ma.us](mailto:Purvi.Patel@state.ma.us)

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attn: Purvi Patel, MEPA Office  
100 Cambridge St., Suite 900 (9th Floor)  
Boston MA, 02114

Re: Stavis Seafoods Development, EEA# 15559

Dear Secretary Beaton,

On behalf of Boston Harbor Now, thank you for the opportunity to comment on the Stavis Seafoods Development Environmental Notification Form for the proposed seafood processing facility, marine warehouse, and marine support office space. After reviewing the environmental notification form and accompanying project plans, our comments follow.

According to the ENF, Stavis Seafoods is a third-generation family owned company, has been a valued member of Boston's working port community since its founding in 1929. As set forth in the ENF, the proposed project would include a significantly upgraded facility for Stavis Seafoods and marine office space for a yet-to-be-determined tenant. The ENF states that, between the two anticipated tenants, the project will support up to 250 permanent jobs and 50 construction-related jobs.

We highly value both the creation of new maritime industry and accessory opportunities within the Raymond Flynn Marine Park and the expansion of Stavis Seafoods to the area.

One of Boston Harbor Now's predecessor organizations, The Boston Harbor Association, was co-founded by the Boston Shipping Association. We strongly support the continuation and expansion of maritime-industrial uses in this Designated Port Area. Beyond this specific project,

we would like to see the City and State partner with maritime stakeholders to identify opportunities to support and accelerate innovation and economic revitalization within the Port of Boston and its Designated Port Areas.

### **Project Description**

As described in the ENF, the proposed project encompasses 7.15 acres of the much larger 42.7 acre Massport Marine Terminal, which in turn is located within the Raymond Flynn Marine Park (formerly known as the Boston Marine Industrial Park). The Boston Redevelopment Authority/Economic Development and Industrial Corporation of Boston currently own the site. They hold a long-term lease agreement with Massport, who will in turn sublease the parcel to the proponent. Because Massport currently controls the site and as defined in 310 CMR 9.03(3), the proposed facility is considered a water-dependent-industrial use, it will not be required to apply for a Chapter 91 license.

The plans for the site include a seafood processing facility, marine warehouse, and marine support office space. Stavis Seafoods hopes to occupy 91,000SF on the northern parcel with the remaining 110,000SF of building area southern parcel to be divided equally between seafood processing and/or marine warehousing and support space for a future tenant. The proposed maximum height of the two buildings will be 35 feet and the project is intended to help ensure the continued existence of the historic maritime industrial uses of the site. We commend the proponent for striving to keep a similar scale, architectural form and uses associated with the maritime industry and history of the area.

### **Climate Change & Sea Level Rise**

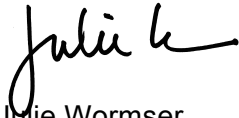
The project site is located within FEMA flood zone AE, land subject to coastal storm flowage. With sea levels predicted to rise between 2.4 and 7.4 feet by the end of the century and a 50/50 chance the rise will exceed 3 feet sometime after 2070, facilities built on this site will need to be prepared to withstand salt water flooding today and damaging wave action in the future. We strongly support the proponent's plans to follow Massport's Design Guidelines and raise critical utilities and life-safety systems to 23.5 feet BCB. We also suggest that the proponent protect the foundation against future wave damage, either through reinforcing the building itself, or by building a low wall to break up the force of storm waves.

The existing site poses another opportunity to protect the facility from future storm surges. Currently, there is a 30-foot-wide Massport service road separating this parcel from the harbor. As proposed, a portion of the parking for the site will be nearest to the waterfront and immediately adjacent to the service road. If possible, we would recommend swapping the northern parking area with the adjacent green lawn to create an additional buffer between the waterfront and the Stavis facility. The landscaping design could include an elevated berm with salt-tolerant plantings to further protect the building from coastal flooding events.

**Alternate Modes of Transportation**

Boston's Seaport District is famously becoming choked with traffic. Stavis Seafood will bring an estimated 150 employees and 200 customers daily to the site; the second building tenant will bring even more. With the closest Silver Line stop located on Northern Avenue and a Hubway station ¼ mile away on Drydock Avenue, we encourage the proponent to consider including bike racks on site and to advocate for additional Hubway locations along Fid Kennedy Avenue to decrease employees' and visitors' dependence on private car use.

Sincerely,



Julie Wormser  
VP Policy



Jill Valdes Horwood  
Waterfront Policy Analyst